## Neal, Arthur

From: dcohen@atlanticcapes.com

Sent: Thursday, March 30, 2006 6:53 PM

To: NOSB Livestock

**Subject:** Shellfish Organic Labeling Standards

Attachments: ATTACHMENT.TXT

March 30, 2006

National Organics Standards Board c/o Valerie Frances Room 4008 – South Building 1400 and Independence Avenue, SW Washington, DC 20230-0001

Via e-mail to: <a href="MOSB.Livestock@usda.gov">MOSB.Livestock@usda.gov</a>

Re: Organic Standards for shellfish

Dear Ms. Frances,

This e-mail expresses the desire of Atlantic Capes Fisheries, Inc. to see the development of Organic Standards established for aquacultured shellfish (i.e. oysters, clams, and scallops). Additionally we believe Organic Standards should be developed for the harvest of wild shellfish (in specific controlled fisheries).

Atlantic Capes Fisheries, Inc. farm raises oysters as well as being a harvester of wild clams and scallops. With proper environmental sampling standards we should be able to develop standards for the labeling of Organic aquacultured shellfish (and eventually some forms of controlled wild harvest – ocean ranching).

I understand your Board has not yet worked to develop standards for the farming of shellfish to be labeled organic. This is a loss for the domestic industry. This is also a loss for the public, who are concerned with eco-labeling and knowing the source of their food supply.

Organic Standards should be possible for the shellfish of our concern. These shellfish (oysters, clams, and scallops) do not require artificial feed. They all are fed from the natural 'organic' environment. Standards need to be developed for the monitoring of the environment, which should be easily accomplished.

Organic standards for shellfish have been developed in other countries, and these overseas shellfish are now being labeled and marketed as Organic in the U.S. by these foreign producers. Why wouldn't we want to provide similar criteria and opportunity for domestic producers, both for sale of Organic labeled shellfish in the US and as exports, to reduce our current trade deficit.

With others in the shellfish industry I support the industry's request for the development of standards that will be applicable to shellfish in a timely fashion. We request that the USDA and

the National Organic Standards Board appoint a Shellfish Organic Standards Development Task Force. This Task Force should be made up of shellfish experts from academia, shellfish industry members, and organic standards experts, for the purpose of developing a set of organic certification standards specific to shellfish that will comply with the National Organics Program standards and will allow domestic producers, such as ourselves, to provide to the public Organic shellfish that the public can consume in confidence.

I look forward to working with you to develop Organic Standards for domestic shellfish.

Thank you,

Daniel Cohen, President Atlantic Capes Fisheries, Inc P. O. Box 555 Cape May, NJ 08204

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